Chapter 2.1.1 Epizootic Haematopoietic Necrosis (EHN) Chapter 3.1.5 Infection with Marteilia Refreingens (MR) Chapter 4.1.2 White Spot Disease (WSD)

Our additional general comments concern two issues that are present in all three disease Chapters contained in the October 2003 Report.

1) The first issue concerns the removal of the category "Specific Disease Free Aquaculture Establishment" from the following Disease Chapters: EHN 2.1.1, Article 2.1.1.13 (EHN free aquaculture establishment); Marteilia refringens 3.1.5, Article 3.1.5.13 (Marteilia refringens free aquaculture establishment); and White Spot Disease 4.1.2, Article 4.1.2.14, (WSD free aquaculture establishment) of the Aquatic Code.

In the 2003 edition of the Aquatic Code, each disease Chapter had a section describing conditions required to qualify as a specific **disease free aquaculture establishment**. All of the references to the specific disease free aquaculture establishment category have been removed from Chapters 2.1.1, 3.1.5, and 4.1.2 of the Aquatic Code. We would like to know if the "disease-free aquaculture establishment" category will be recognized or incorporated under the term specific disease free zone.

For example, in the current proposed wording will it be possible for a disease free aquaculture establishment to be recognized in a disease-free zone, or will it be possible to have a disease-free establishment for a given disease located within a zone that is affected by that disease?

Will the proposed changes concerning disease free aquaculture establishments allow for the official recognition and certification of specific pathogen free aquaculture establishments in zones that may be affected for the diseases in question? If not, we would recommend retaining the requirements for establishing disease free aquaculture establishments.

2) The second general comment we have with all three disease Chapters concerns the length of time proposed for a country or zone to be officially declared free of a specific disease: Chapter 2.1.1, EHN, Articles 2.1.1.5 (EHN free country), and 2.1.1.6 (EHN free zone); Chapter 3.1.5 Infection with Marteilia refringens, Articles 3.1.5.5 (Marteilia refringens free country) and Article 3.1.5.6 (Marteilia refringens free zone); and Chapter 4.1.2 WSD, Articles 4.1.2.5 (WSD free country) and Article 4.1.2.6 (WSD free zone).

In each of the disease chapters, the OIE proposes that a country may be declared free of a disease where susceptible species are present and there has never been any observed occurrence of the disease for at least 25 years. The proposed length of time, 25 years, is not scientifically justified, is extremely long, and appears arbitrary.

Our experts believe that, based on the disease in question, it would seem appropriate that depending on the nature of the disease, in order to ensure that a country/zone/establishment is disease-free, the disease should not be found at appropriate times and temperatures for two generations, or a scientifically validated period of time.

For example, for farmed Atlantic salmon, in order to prove a vertically transmissible disease is not present in the population, if it has not been found at appropriate times and temperatures for four years (one generation is two years), then it would be reasonable that the tested country/zone/establishment could be declared disease-free.

Similarly, depending on the species and disease, it seems logical that if basic disease security conditions have been in place for two generations (or a scientifically validated period of time) rather than the seemingly arbitrary choice of ten years, and infection is not known to be established in wild populations, that again, a country/zone/establishment should be able to declare itself disease-free.